Maricopa County Arizona Department of Employee Benefits and Health

Assessment of the Administrative Agency
Ryan White Part A Grant
Phoenix EMA
June - July, 2013

Presented by
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Purpose of the Report

Knowledge Capital Alliance, Inc. (KCA) was engaged to conduct an assessment of the Administrative Agency (AA) for Grant Year 2013 as mandated by the Ryan White Care Act (Sections 2602 and 2617). The focus of the 2013 assessment was: 1) the efficiency and effectiveness of the provider invoicing and payment process, and 2) the Administrative Agency's ability to implement the directives of the Ryan White Planning Council (RWPC). In addition, the 2013 assessment compares the data collected to the similar data collected for grant years 2009, 2010, 2011 and 2012.

Assessment Methodology

KCA conducted a three-phased evaluation process to perform this assessment of the Administrative Agency. The three phases were:

- **Phase 1**: Interviews with the Administrative Agent and the Provider Relations & Contracts Administrator
- Phase 2: Surveys of the Ryan White Service Providers and the Ryan White Planning Council
- **Phase 3**: Reviews of Administrative Agency Processes, Reporting Mechanisms, and Performance Data

The three-phased evaluation process was conducted during June and July, 2013 in Maricopa County, Arizona.

Findings

The findings of the 2013 Assessment of the Administrative Agency are reported in three parts:

- Part 1: Efficiency and Effectiveness of the Service Provider Invoicing and Payment Process,
- Part 2: Administrative Agency's Ability to implement the Directives of the Ryan White Planning Council
- Part 3: Overall Survey Comments.

A complete listing of the Service Provider and RWPC survey questions, answers, and comments can be found in Appendices 1 and 2 at the end of this document. KCA received a response rate of 91.3% of the RWPC and 100% of the active Service Providers.

NOTE: Due to the relatively small sample size, year over year changes may seem exaggerated.

Part 1 Findings: Efficiency and Effectiveness of the Service Provider Invoicing and Payment Process.

There are currently five measures of efficiency and effectiveness regarding service provider invoicing and payment processing. These five measures are reflected in the table below. The average time to process a Service Provider's invoice was 23 work days in 2013, down significantly from 28 work days in 2012, equal to the 23 work days in 2011, and down from the 31 days in 2010 and 43 days in 2009. It should also be noted that the number of invoices which are not being processed and paid within 60 days was down by 2 to 12 in 2013.

Survey Item	2013	2012	2011	2010	2009	2012- 2013 Change	Notes
Average number of work days to process a Service Provider's Invoice	23 Days	28 Days	23 Days	31 Days	43 Days	-5 days	
Minimum turnaround time of accurate invoices (<60 days)	100%	100%	100%	90%	100%	+0%	
Average turnaround time of accurate invoices (<60 days)	100%	100%	92%	80%	92%	+0%	
Maximum turnaround time of accurate invoices (<60 days)	60%	63%	64%	63%	42%	-3%	
Accuracy of payments	90%	85%	82%	79%	71%	+5%	
Number of invoices paid in greater than 60 days	12	14	13	36	26	-2	

Survey results indicate that turnaround times continue to improve and the positive working relationship that was noted in last year's assessment continues between the RWPC, the Service Providers, and the Administrative Agency.

Part 2 Findings: Administrative Agency's Ability to implement the Directives of the Ryan White Planning Council.

A survey of the Planning Council gathered perceptions from the membership in two areas: 1) Did the Administrative Agency Implement the Directives of the RWPC in an accurate and timely manner? And, 2) Did the Administrative Agency accurately contract the funding allocated by the RWPC?

RWPC Survey Results – Implementing Directives: The RWPC strongly believes that the Administrative Agency has implemented the directives in an accurate and timely manner. The survey results showed that 87% of the RWPC members responding believe that the directives were implemented in a timely manner. This was slightly down from 90% for the 2012 grant year. The survey results also showed that 84% of the RWPC members responding believe that the directives were implemented in an accurate manner. This was down slightly from the 86% for the 2012 grant year and 92% for the 2011 grant year.

RWPC Survey Results – Contract the Funding: 88% of the RWPC members responding strongly believe that the Administrative Agency has accurately contracted the funding allocated by the RWPC. This figure is up from 80% in 2012 and slightly down from the 91% in 2011.

RWPC Survey Results – Adequate Notification and Information: 89% of the RWPC members responding strongly believe that the Administrative Agency provides adequate notification for the reallocation of funds. This figure is down slightly from 90% in 2012 and 92% in 2011. Additionally, 88% of the RWPC members responding strongly believe that the Administrative Agency provides adequate information regarding the reallocation of funds. This figure is down from 90% in 2012 and 91% in 2011.

Survey Item	2013	2012	2011	2010	2009	2012- 2013 Change	Notes
Timely implementation of PC directives	87%	90%	90%	91%	84%	-3%	
Accurate implementation of PC directives	84%	86%	92%	93%	84%	-2%	
AA provides sufficient information to PC	85%	93%	91%	93%	82%	-8%	
Accurate contracting of allocated funds by PC	88%	80%	91%	88%	90%	+8%	
AA provides adequate notification for reallocation of funds	89%	90%	92%	92%	80%	-1%	
AA provides adequate information for reallocation of funds	88%	90%	91%	92%	86%	-2%	

Findings: Overall Survey Comments

In addition to the findings above, the RWPC and the Service Providers were asked to comment on a number of items related to the performance of the Administrative Agency such as the effectiveness of the AA's communication process and the current relationship between the Service Provider's organizations and the AA. The survey responses were very favorable indicating the positive relationship between the RWPC, the Service Provider organizations, and the Administrative Agency noted in last year's assessment continues to improve. Also, it is quite clear from the survey responses (see below) that the Administrative Agency continues to work very hard to establish an effective communication process. The renewed sense of collaboration between all parties which was evident beginning in 2009 continues to show improvement.

Survey Item	2013	2012	2011	2010	2009	2012-2013 Change
Communications between PC and AA	93%	90%	93%	91%	90%	+3%
Understanding of the role of the AA	98%	96%	98%	91%	87%	+2%
Understanding of the role of the PC	100%	99%	99%	96%	95%	+1%

2012 Recommendations and Responses

KCA provided the following recommendations for Grant Year 2012:

Recommendation 1:

The Administrative Agency's team structure (Administration Team, Fiscal Team and Quality Management Team) which was implemented in previous years should continue to provide technical assistance to the providers. These interactions have produced positive results and strengthened the providers' capacity to manage their way through significant program changes.

AA Response:

In 2012 the Administrative, Quality Management and Fiscal Teams provided 57 technical assistance sessions with 15 providers. Topics addressed in these sessions included, but were not limited to:

Fiscal

- Billing
 - Data entry and reporting
 - Invoice format and submission
 - Supplemental documentation requirements
 - Reconciliations
 - Reimbursement methodologies
 - Budget preparation
 - Variance reporting
 - Site Visits
- Contractual/Administrative
- HRSA National Monitoring Standards
- Policies and Procedures
- Contract amendments/procurement
- Conditions of Award
- Site Visits
- Client eligibility
- CAREWare
 - Data collection and entry
 - Ryan White Data Report (RSR)
 - Client eligibility

Quality Management

- Standards of care
- Health outcomes measuring and reporting
- Client charting and documentation
- Best practices
- Service category-specific targeted training

Recommendation 2:

The Administrative Agency should continue to use multiple formats for providing technical assistance to providers. The AA's 2012 approach to providing technical assistance included targeted site visits, individual provider meetings, go-to meetings and/or All Provider Meetings to address system issues with all providers, and individual one-on-one sessions. These multiple approaches provide valuable, targeted assistance while, at the same time, limiting disruptions to the day-to-day activities of the providers.

AA Response:

The Administrative Agency utilized multiple methods to provide technical assistance in 2012, including:

Telephone calls: 11
AA Office meetings: 10
Provider On-site meetings: 32

Go-To Meetings: 3
Off-Site Meetings: 1

Recommendation 3:

The Administrative Agency should continue to monitor the effectiveness of its approach to the RFP process. The 2012 decision to streamline the RFP process and split the process in two so that no current contractor will need to respond to more than 1 RFP at a time over the next 18 months, appears to be sound thinking. Continuous monitoring will determine if this approach is sufficient or additional support and assistance is required.

AA Response:

The Administrative Agency is required to reissue RFPs for contracts that had an end date of February, 2014. These service categories include: Outpatient Ambulatory Medical Care, Case Management, Behavioral Health, Transportation, Nutrition and Consulting Services. In order to streamline the RFP process, and to avoid requiring providers to respond to more than 1 RFP at a time, the AA issued 3 RFPs in 2012 for Behavioral Health Services, Nutrition and Transportation. The RFPs were issued at different times throughout the year, which provided adequate time for providers to submit bids for a variety of services. All contracts for the services in these categories have been awarded, and feedback from the providers on the new approach was positive.

The AA will issue 3 RFPs in 2013, including Outpatient Ambulatory Medical Care, Case Management and Consulting Services. Contracts for these service categories will be awarded prior to Feb, 2014. Feedback from the providers to this new process has been positive to date.

Recommendation 4:

The Administrative Agency should stress the importance of the pre-bid conferencing process to all providers. The placement of this information on the website is valuable but a reminder calendar or some active process should be established which signals/reminds providers of up-coming pre-bid conferences and the importance of their attendance and participation.

AA Response:

In addition to the BIDSync notice of the pre-bid conference for all RFPs, the Administrative Agency stressed the importance of the pre-bid conferencing process to all providers, and provided reminders to all current vendors of the upcoming pre-bid conferences, and the importance of their attendance and participation. All questions submitted during the RFP question period were responded to in a timely manner and the responses were posted on BIDSync. Technical Assistance was also available through Procurement Services to potential vendors, either by phone, email and submission of questions through BidSync.

Recommendation 5:

The Administrative Agency should continue to provide technical assistance where needed to assist providers in meeting HRSA's reporting requirements. Efforts by the AA to date appear to have been beneficial. A continued focus on these reporting requirements will be a great aid to existing providers and critical to any new providers coming online.

AA Response:

The Administrative, Fiscal and Quality Management Teams provided targeted technical assistance to Direct Dental, EIS and Outpatient Ambulatory Care providers related to HRSA reporting requirements. The addition of Direct Dental services in 2012 required additional technical assistance to enable capacity building and infrastructure development. The EMA was fortunate to be able to host the National Quality Center in March, 2012 to provide technical assistance

specifically addressing the development and monitoring of health outcomes. The Quality Management Team conducted on-site technical assistance related to health outcomes for all providers following the National Quality Center meetings.

Recommendation 6:

The Administrative Agency should continue to provide support and corrective action for the providers during site visits. The new Universal Standards implemented in 2011 may still present problems for some providers even though some providers are currently meeting the requirements.

AA Response:

The Administrative Agency conducted onsite contract review and monitoring for all providers during 2012. All providers demonstrated an improved ability to meet the requirements of the Universal Standards during 2012. All providers that required corrective action plans related to findings during the site visits were able to successfully implement the corrective action plans before the 2012 grant year closure.

Recommendation 7:

The Administrative Agency should investigate the possibility of creating the expense report and variance report in CAREWare to eliminate redundant data entry. [Service Provider suggestion]

AA Response:

The Administrative Agency has scheduled an automated expense/variance report project for the summer. This project would automate interactions between the CAREWare data system (that providers submit client utilization and billing data in throughout the year) and the Grant Management System which the Administration Agent uses to manage the grant's fiscal systems. The goal of this project is to integrate data from both of these sources to create agency specific 1) prepopulated variance reports and 2) identifies billing or utilization items with high variance. The automated process will allow providers to focus on the narrative explanations of noted variances instead of recalculating previously entered costs on a quarterly basis.

Recommendation 8:

The recommendations below have been addressed and implemented by the Administrative Agency over the past four years resulting in significant enhancements to efficiency and effectiveness across the board. It is recommended that these items continue to be reviewed and included in the AA's efforts to continuously improve.

- 1. The Administrative Agency should continue to use its comprehensive approach of 1) provider training, 2) group and individual workshops, 3) policy enforcement, and 4) operational support and assistance These training activities and targeted technical assistance are producing significant results in both provider performance and enhanced communication between providers and the Administrative Agency.
- 2. The RWPC should continue to provide a comprehensive orientation regarding the roles and responsibilities of its members.
- The Administrative Agency should continue to incorporate the experience of the "compliance-focused"
 Management Assistant to improve communication and understanding of expectations of performance for
 providers as well as members of the AA's staff.
- 4. The Administrative Agency should continue to provide workshops for its staff to help them understand some of the management limitations of some of the Service Providers. The current weekly team meeting structure provides the forums necessary to address these issues.
- 5. The RWPC should continue to use a tool such as Survey Monkey to assess the Administrative Agency.
- 6. The RWPC and the AA should continue using year-over-year data review as a methodology for identifying trends and determining opportunities for continuous improvement.

The Administrative Agency is committed to continue to provide technical assistance to all providers based on the individual needs of each provider. This approach has proven to be very successful in establishing strong working relationships between the AA and the providers, and has demonstrated continuous quality improvement in all aspects of the Ryan White continuum of care.

The relationships that have been established over the past 5 years between the AA and the providers will be critical to the successful implementation of the Affordable Care Act as it relates to the Ryan White Part A clients' enrollment in the ACA this next year. The AA and the Planning Council have begun working with the Ryan White Parts B, C and D programs, and partners statewide to develop and implement strategies to identify, inform, educate and enroll all eligible Ryan White clients in the ACA. This collaborative effort will be require strong communication, coordination and commitment from all of the involved groups, and the Part A Program will be an active participant and leader in this important endeavor.

2013 Recommendations

KCA provides the following recommendations for Grant Year 2014:

- 1. The Administrative Agency's team structure (Administration Team, Fiscal Team and Quality Management Team) which was implemented in 2012 and again in 2013 should continue to provide technical assistance to the providers. These interactions have produced positive results and strengthened the providers' capacity to manage their way through significant program changes. The Administrative Agency should continue to use multiple formats for providing technical assistance to providers. The AA's 2012-2013 approach to providing technical assistance included targeted site visits, individual provider meetings, go-to meetings and/or All Provider Meetings to address system issues with all providers, and individual one-on-one sessions. These multiple approaches provide valuable, targeted assistance while, at the same time, limiting disruptions to the day-to-day activities of the providers.
- 2. The Administrative Agency should continue to monitor the effectiveness of its approach to the RFP process. The 2012 decision to streamline the RFP process and split the process in two so that no current contractor will need to respond to more than 1 RFP at a time over the next 18 months, appears to be sound thinking. Continuous monitoring will determine if this approach is sufficient or additional support and assistance is required. Feedback from the 2013 surveys was positive. The Administrative Agency should continue to monitor this approach in 2014.
- 3. The Administrative Agency should stress the importance of the pre-bid conferencing process to all providers. The placement of this information on the website is valuable but a reminder calendar or some active process should be established which signals/reminds providers of up-coming pre-bid conferences and the importance of their attendance and participation.
- 4. The Administrative Agency should continue to provide technical assistance where needed to assist providers in meeting HRSA's reporting requirements. Efforts by the AA to date appear to have been beneficial. A continued focus on these reporting requirements will be a great aid to existing providers and critical to any new providers coming online.
- 5. The Administrative Agency should continue to provide support and corrective action for the providers during site visits. The new Universal Standards implemented in 2011 may still present problems for some providers even though some providers are currently meeting the requirements.
- 6. The Administrative Agency should review the results of the summer 2013 project and determine the possibility of implementing the expense and variance report in CAREWare during 2014.

The recommendations below have been addressed and implemented by the Administrative Agency over the past three years resulting in significant enhancements to efficiency and effectiveness across the board. It is recommended that these items continue to be reviewed and included in the AA's efforts to continuously improve.

- The Administrative Agency should continue to use its comprehensive approach of 1) provider training, 2) group and individual workshops, 3) policy enforcement, and 4) operational support and assistance These training activities and targeted technical assistance are producing significant results in both provider performance and enhanced communication between providers and the Administrative Agency.
- 2. The RWPC should continue to provide a comprehensive orientation regarding the roles and responsibilities of its members.
- The Administrative Agency should continue to incorporate the experience of the "compliance-focused"
 Management Assistant to improve communication and understanding of expectations of performance for
 providers as well as members of the AA's staff.
- 4. The Administrative Agency should continue to provide workshops for its staff to help them understand some of the management limitations of some of the Service Providers. The current weekly team meeting structure provides the forums necessary to address these issues.
- 5. The RWPC continues to use a tool such as Survey Monkey to assess the Administrative Agency.
- 6. The RWPC and the AA should continue using year-over-year data review as a methodology for identifying trends and determining opportunities for continuous improvement.

Appendix 1 - Service Provider Survey Results

#	Question	2013	2012	2011	2010	2009	2013 Comments
1	What is the minimum, average and maximum turnaround for payment of invoices accurately submitted to the Administrative Agency for your organization?	Minimum: < 30 days = 6, 30 - 60 days = 4, > 60 days = 0, Don't Know = 0 Average: < 30 days = 3, 30 - 60 days = 7, > 60 days = 0, Don't Know = 0 Maximum: < 30 days = 3, 30 - 60 days = 3, > 60 days = 4, Don't Know = 1	Minimum: < 30 days = 4, 30 - 60 days = 6, > 60 days = 0, Don't Know = 0 Average: < 30 days = 2, 30 - 60 days = 6, > 60 days = 0, Don't Know = 0 Maximum: < 30 days = 1, 30 - 60 days = 3, > 60 days = 3, Don't Know = 1	Minimum - <30=6, 30-60=7, >60=0, Don't Know=2 Average - <30=1, 30-60=10, >60=1, Don't Know=2 Maximum - <30=0, 30-60=7, >60=4, Don't Know=2	Minimum - <30=5, 30-60=4, >60=1 Average - <30=3, 30-60=5, >60=2 Maximum - <30=1, 30-60=4, >60=3	Minimum - <30=3, 30-60=9, >60=0 Average - <30=0, 30-60=11, >60=1 Maximum - <30=0, 30-60=5, >60=7	
2	How accurate are the payments of invoices by the Administrative Agency?	Accuracy = 90%	Accuracy = 85%	Accuracy = 82%	Accuracy = 79%	Accuracy = 71%	
3	In the last 12 months, how many invoices have taken greater than 60 days to process?	Total invoices > 60 days = 12	Total invoices > 60 days = 14	Total invoices > 60 days = 13	Total invoices > 60 days = 36	Total invoices > 60 days = 26	one invoice >60 days had an issue with ineligible individuals.
4	Do you feel that the information you have to provide to the Administrative Agency for monthly billing purposes is:	About Right = 90% Too Much = 10%	About Right = 70% Too Much = 30%	About Right = 75% Too Much = 25%	About Right = 47% Too Much = 47%	About Right = 33% Too Much = 67%	Much of the information is already present in CAREWare and having to submit an expense report is in excess when a financial report and General Ledger is already being submitted. All of these documents state the same information.
5	Changes were implemented in 2010 in the amount/type of documentation required in monthly billings. How would you rate these changes compared to the monthly billing requirements in 2009?	Question not asked in 2013	Question not asked in 2012	Question not asked in 2011	Much Better = 3 Better = 7 About the Same = 3		
6	Do you receive adequate technical assistance from the Administrative Agency for you to provide complete billing packets?	Adequate Technical Assistance = 83%	Adequate Technical Assistance = 70%	Adequate Technical Assistance = 90%	Adequate Technical Assistance = 79%	Adequate Technical Assistance = 81%	Amazing team! Professional people who know a great deal and are willing to share!

#	Question	2013	2012	2011	2010	2009	2013 Comments
7	Please rate your satisfaction with the availability, communications and technical assistance from the Administrative Agency.	Availability - 90% Communications - 87% Technical Assistance - 87%	Availability - 93% Communications - 85% Technical Assistance - 85%	Availability - 90% Communications - 88% Technical Assistance - 88%	Availability - 79% Communications - 79% Technical Assistance - 82%	Availability - 87% Communications - 77% Technical Assistance - 88%	Comments
8	How would you describe the relationship between your organization and the Administrative Agency?	Relationship - 79%	Relationship - 77%	Relationship - 73%	Relationship - 84%	Relationship - 81%	
9	How would you describe the Ryan White Part A contracting process?	Ease of understanding RFP - 59% Time allotted for response - 55% Negotiation process/final contracting - 55% Awareness of reporting requirements, etc 75% Contract Monitoring (Site Visit) - 68%	Ease of understanding RFP - 58% Time allotted for response - 64% Negotiation process/final contracting - 58% Awareness of reporting requirements, etc 63% Contract Monitoring (Site Visit) - 64%	Ease of understanding RFP - 62% Time allotted for response - 62% Negotiation process/final contracting - 67% Awareness of reporting requirements, etc 67% Contract Monitoring (Site Visit) - 69%	Ease of understanding RFP - 67% Time allotted for response - 67% Negotiation process/final contracting - 65% Awareness of reporting requirements, etc 73%	Ease of understanding RFP - 62% Time allotted for response - 67% Negotiation process/final contracting - 73% Awareness of reporting requirements, etc 71%	
10	Do you need additional technical assistance or information from the Administrative Agency regarding any issues related to this survey?	No "Yes" responses	One "Yes" response	1 "Yes" response, but no contact information entered.			
11	If you answered "yes" to the previous question and you would like us to provide your contact information to the Administrative Agency, please provide the following information".			No contact information	No one requested technical assistance.	No one requested technical assistance.	

Appendix 2 - Planning Council Survey Results

#	Question	2013	2012	2011	2010	2009	2013 Comments
1	Please indicate your membership status on the Planning Council (please select all that apply).	General Public - 38% Institutional Member - 38% Service Provider Rep – 24 % Not Sure - 0%	General Public - 30% Institutional Member - 35% Service Provider Rep - 35% Not Sure - 0%	General Public - 37% Institutional Member - 22% Service Provider Rep - 37% Not Sure - 4%	General Public - 38% Institutional Member - 24% Service Provider Rep - 34% Not Sure - 3%	General Public - 40% Institutional Member - 24% Service Provider Rep - 32% Not Sure - 4%	
2	Are the directives issued by the Ryan White Planning Council implemented by the Administrative Agency in a timely and accurate manner?	Timely - 87% Accurate - 84%	Timely - 94% Accurate - 91%	Timely - 90% Accurate - 92%	Timely - 91% Accurate - 93%	Timely - 84% Accurate - 84%	From what I've witnessed from PC meetings, almost always. I can't imagine a more collaborative and cooperative relationship between the AA's office and the Planning Council. It is a wonderful partnership and it is a pleasure to watch the ease by which it operates. Rose makes it look easyalthough I know it is not!
3	Does the Administrative Agency provide sufficient information to the Planning Council to allow them to monitor the implementation of the Planning Council directives?	Provide sufficient information - 85%	Provide sufficient information - 93%	Provide sufficient information - 91%	Provide sufficient information - 93%	Provide sufficient information - 82%	Rose does a magnificent job of keeping us up to date and explaining things in a way that everyone can understand and make the best decision. Yes, Information is always provided. Excellent! Always has data ready, digestible for multiple audiences, and yet allows people to make their own decisions. Successfully walks the tightrope of providing information but not dominating.
4	Do you feel that the Administrative Agency accurately contracts the funding allocated by the Planning Council?	Accurately contracts funds - 88%	Accurately contracts funds - 94%	Accurately contracts funds - 91%	Accurately contracts funds - 88%	Accurately contracts funds - 90%	I really don't know. Very high integrity!

#	Question	2013	2012	2011	2010	2009	2013 Comments
5	Does the Administrative Agency provide adequate information and notification to allow reallocation of funds to other categories if necessary to ensure that grant funds are managed according to Planning Council directives?	Provides adequate notification? - 94% Provides adequate information? - 89%	Provides adequate notification? - 94% Provides adequate information? - 94%	Provides adequate notification? - 92% Provides adequate information? - 91%	Provides adequate notification? - 92% Provides adequate information? - 92%	Provides adequate notification? - 80% Provides adequate information? - 86%	The notification part is seldom the fault of the Administrative Agent. It's usually other entities (HRSA, service providers, etc.) that do not provide information timely enough and so the AA is put "behind the 8 ball." Transparent, collaborative, seasons and the seldom to the seldom the seldom the seldom the seldom to the seldom the s
6	As a Planning Council member, please rate the communication between the Planning Council and Administrative Agency.	Communications - 93%	Communications - 96%	Communications - 93%	Communications - 91%	Communications - 90%	exceptional! Terrific. Once again, I see a fair, non-judgmental, quiet steering of the rudder so that the boat stays on course. Rose always provides the best in communicating information to the planning council Thank you Rose
7	Do you understand the roles and responsibilities of the Administrative Agency and Planning Council?	Administrative Agency - 98% Planning Council - 100%	Administrative Agency - 96% Planning Council - 99%	Administrative Agency - 98% Planning Council - 99%	Administrative Agency - 91% Planning Council - 96%	Administrative Agency - 87% Planning Council - 95%	
8	Please share any additional comments or information about the relationship between the Planning Council and the Administrative Agency.						